



**ROSENBAUM & ROSENBAUM, P.C.**

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April 20, 2023

United States District Judge Edgardo Ramos  
U.S. District Court, Southern District  
40 Foley Square  
New York, New York 10007

## MEMO ENDORSED

Re: Linzy v. Uber Technologies, Inc.  
Docket Number: 21-cv-05097  
Our Client: Shaarille Linzy

Honorable Edgardo Ramos,

We represent Plaintiff, Sharille Linzy, in connection with the above referenced matter. The current fact discovery deadline was April 17, 2023. Our office received an e-mail from defense counsel, Benjamin Levites, on April 13, 2023 requesting we schedule defendant's deposition on April 28, 2023 at 11:00 AM, to which we agreed upon. The reason the adjournment was necessary is because the parties were not able to agree to a mutually acceptable date for the deposition prior to the end of fact discovery.

Subsequently, defense counsel emailed us on April 19, 2023 informing us they will not be producing a witness on April 28, 2023. Defense counsel does not join in our request for an extension of time to complete defendant's deposition because defendant has argued we have not issued a 30(b)(6) notice of deposition, however this was served on July 15, 2022.

It is respectfully requested that the Court endorse the above extension.

Respectfully,

Kevin S. Klein, Esq.

CC:

Via ECF

COUGHLIN BETKE LLP

Defendant Uber Technologies, Inc., is directed to respond by Wednesday, April 26, 2023. IT IS SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: April 20, 2023  
New York, New York